

Bruce J. Highman, (State Bar No. 101760)  
HIGHMAN & HIGHMAN  
A PROFESSIONAL LAW ASSOCIATION  
582 Market Street, Suite 1212  
San Francisco 94104  
Telephone: (415) 982-5563  
Fax: (415) 982-5202  
Email: bruce.highman@highmanlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CINDY COLLEY, an individual,

Plaintiff,

v.

SNAPMEDTECH, INC. DBA  
SNAPNURSE, a corporation, and DOES 1-  
10, inclusive,

Defendants.

No. 22-cv-03884-HSG

STIPULATION TO CONTINUE CASE  
MANAGEMENT CONFERENCE AND  
DEADLINE FOR FILING JOINT CASE  
MANAGEMENT STATEMENT;  
DECLARATION OF BRUCE HIGHMAN  
IN SUPPORT OF STIPULATION; ORDER

The parties hereto, by and through their respective attorneys, hereby stipulate to continuing the date of the case management conference from October 4, 2022, to October 18, 2022, at 2:00 pm or as soon thereafter as the matter may be heard, and to continuing the deadline for filing the joint case management statement from September 27, 2022 to October 11, 2022, for the reasons set forth in the Declaration of Bruce Highman below.

DATED: September 15, 2022

/s/ Bruce J. Highman

Bruce J. Highman  
Highman & Highman  
Attorneys for Plaintiff

DATED: September 15, 2022

/s/ Vana Ebrahim

Vana Ebrahimi  
Fisher & Phillips LLP  
Attorneys for Defendant  
SnapMedTech, Inc. dba SnapNurse

DECLARATION OF BRUCE HIGHMAN

I, Bruce Highman, declare:

1. I am the attorney of record for plaintiff Cindy Colley.

2. The parties had agreed to serve their disclosures on each other on Thursday, September 22, 2022. I had been working with plaintiff Colley on the disclosures earlier this week. I will need to work with her also in preparing plaintiff's portion of the joint case management statement and possibly in preparing for the case management conference.

3. On Monday night, September 19, 2022, Colley's 39 year old son had a heart attack. Colley, a registered nurse with experience nursing in hospitals, believes her son reasonably may have died if the ambulance had not gotten him to the hospital as quickly as it did. Her son is still in the Intensive Care Unit. When he is discharged, he will be staying with Colley for awhile since as a registered nurse, she can take proper care of him.

4. Colley is focused on her son's life and care right now and is spending long hours with him in the hospital. She is not able work with me on disclosures or in regard to the joint case management statement. The two week continuance to which the parties have stipulated will allow Colley some time to focus solely on her son's life and care at this very critical time for him.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on September 21, 2022


/s/ Bruce J. Highman

Bruce J. Highman

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/22/2022

  
Honorable Haywood S. Gilliam, Jr.  
United States District Judge